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**Via ECF**

Hon. Philip M. Halpern, U.S.D.J.  
The Hon. Charles L. Bricant Jr. Federal Building and Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: *Wolf, et al. v. Dolgen New York, LLC*  
Case No.: 7:23-cv-00558-PMH

Dear Judge Halpern:

Plaintiffs Joseph Wolf, Carmen Wolf, and the putative class (collectively, the “Wolfs”), and Defendant Dolgen New York, LLC (“Dollar General”, the parties collectively, the “Parties”), through their undersigned counsel, submit this joint letter with a status update regarding settlement in accordance with Your Honor’s order provided at the August 29, 2024 in-person hearing.

The Parties have had multiple conversations with each other and the mediator since the last status report, (D.E. 77), and the two sides continue to work on a possible resolution.

Respectfully submitted,

**THE DANN LAW FIRM, PC**

/s/ Javier L. Merino  
Javier L. Merino, Esq.  
*Counsel for Plaintiffs and the Putative Class*

**MCGUIREWOODS LLP**

/s/ Philip A. Goldstein  
Philip A. Goldstein, Esq.  
*Counsel for Defendant Dolgen New York, LLC*